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6 UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

7 UNITED STATES OF AMERICA,

8 Plaintiff,

9 v.

10 [REDACTED]
11 JAIMES TIN AUNG, and
12 [REDACTED]

13 Defendants.

INDICTMENT 2:24-CR-106-TOR-1

Vio.: 18 U.S.C. § 371
Conspiracy to Commit
International Parental
Kidnapping
(Count 1)

18 U.S.C. §§ 1204, 2
International Parental
Kidnapping
(Count 2)

15
16 The Grand Jury charges:

17 COUNT 1

18 On or about May 2024 and continuing until on or about July 7, 2024, in the
19 Eastern District of Washington, and elsewhere, including Mexico, the Defendants

20 [REDACTED] JAIMES TIN AUNG, [REDACTED],
21

1 knowingly combined, conspired, confederated, and agreed to commit an offense
2 against the laws of the United States, that is, international parenting kidnapping, in
3 violation of 18 U.S.C. §1204, all in violation of 18 U.S.C. § 371.

4 OVERT ACTS

5 In furtherance of the conspiracy and to effect the object, the conspirators
6 committed numerous over acts in the Eastern District of Washington and
7 elsewhere, including the following:

- 8 1. On or about May 29, 2024, [REDACTED] conducted a custody
9 exchange of Minor Victim, with Minor Victim's mother, Samara Harmon, at
10 the Pullman, Washington police station.
- 11 2. On or about May 29, 2024, [REDACTED] retrieved a Cadillac
12 registered to JAIMES TIN AUNG, from a storage unit at Inland Boat and
13 RV Storage, in Athol, Idaho.
- 14 3. On or about May 29, 2024, [REDACTED] left the Seattle-Tacoma
15 International airport, where she had checked in for a scheduled flight, to
16 meet [REDACTED] and Minor Victim and travel to Mexico.
- 17 4. On or about May 30, 2024, [REDACTED] traveled with Minor
18 Victim through the Eastern District of Washington, into the Western District
19 of Washington, where he met up with [REDACTED] at a
20 predesignated location, in Tacoma, Washington.

1 5. On or about June 1, 2024, [REDACTED]

2 [REDACTED] crossed the border to Mexico with Minor Victim.

3 6. On or about June 3, 2024, [REDACTED] failed to return Minor

4 Victim to Minor Victim's lawful parent Samara Harmon, at the designated

5 location in Pullman, Washington, pursuant to the parenting plan then in

6 place.

7 7. On or about May 31, 2024, through June 16, 2024, JAIMES TIN AUNG

8 assisted [REDACTED] in avoiding law enforcement detection

9 by exchanging coded/encrypted messages and warning [REDACTED]

10 [REDACTED] about the ongoing investigation and how to avoid detection.

11 8. On or about June 1, 2024, until July 4, 2024, [REDACTED]

12 [REDACTED] remained in Mexico with Minor Victim, contrary to

13 Samara Harmon's parental rights.

14 COUNT 2

15 On or about June 1 through July 7, 2024 in the Eastern District of

16 Washington and elsewhere, including Mexico, the Defendants [REDACTED]

17 [REDACTED] JAIMES TIN AUNG, [REDACTED] did remove Minor

18 Victim from the United States and retain Minor Victim outside of the United States

19 with the intent to obstruct the lawful exercise of another person's parental rights,

20 and did aid and abet the same, in violation of 18 U.S.C. §§ 1204, 2.

1 DATED this _____ day of August 2024.

2 A TRUE BILL

3
4 _____
Foreperson

5 _____
Vanessa R. Waldref
United States Attorney

6
7 _____
Rebecca R. Perez
Assistant United States Attorney

8
9 _____
10 Michael J. Ellis
Assistant United States Attorney